## UNITED STATES DISTRICT COURT IN AND FOR THE NORTHERN DISTRICT OF IOWA CENTRAL DIVISION

)
) CASE NO. 11-cv-03034-MWB
) MOTION FOR EXTENSION OF ) TIME TO FILE A REPLY BRIEF
j
j
)
)
)
)
)
j

Defendants, Netvertise LTD, Richard Szeles and Laslo Racz move for an extension of time to file its Reply to Plaintiff's Resistance to the Motion to Dismiss and in support state:

- On April 30, 2012, Plaintiff filed its Resistance and Over length Brief in Support of its Resistance to Defendant's Motion to Dismiss.
- 2. On April 29<sup>th</sup>, 2012 the Plaintiff filed an over length brief in Case No: **11- cv-03033-MWB**.
- Defendants' counsel is feverishly working to prepare a brief in case No.
   11-cv-3005MWB, yet another case pending with this Court.
- 4. Communications and coordination of schedules is challenging with the Defendants who are in Europe.
- 5. Defendants have not requested any prior extensions in this matter.

  Case 3:11-cv-03034-MWB-LTS Document 25 Filed 05/10/12 Page 1 of 3

- Defendants request up to and including Friday May 18, 2012, to file a
   Reply to Plaintiff's Resistance to the Motion to Dismiss.
- 7. Pursuant to Local Rule 7(l), the undersigned has conferred with counsel for Plaintiff regarding this request and Plaintiff's counsel has indicated that he will resist the Request for an Extension of Time.

WHEREFORE, Defendants, **NETVERTISE LTD.**, **D/B/A HARDXXXTUBE.COM**, **RICHARD SZELES AND LASLO RACZ**, respectfully requests that the Court grant them up to and including May 18, 2012, to file its Reply to Plaintiff's Resistance to Motion to Dismiss.

/s/ Connie Alt\_

CONNIE ALT AT0000497 JENNIFER E. RINDEN AT0006606

for

SHUTTLEWORTH & INGERSOLL, P.C. 500 US Bank Bldg., P.O. Box 2107

Cedar Rapids, IA 52406

PHONE: (319) 365-9461 FAX: (319) 365-8564 cma@shuttleworthlaw.com

/s/Valentin Gurvits

Valentin Gurvits, Esq.
Boston Law Group, PC
825 Beacon Street, Suite 20
Newton, MA 02459
BBO # 643572
(617) 928-1804
vgurvits@bostonlawgroup.com

/s/Evan Fray-Witzer

Evan Fray-Witzer, Esq. Ciampa Fray-Witzer, LLP 20 Park Plaza, Suite 804 Boston, MA 02116 (617) 723-5630 Evan@CFWLegal.com

ATTORNEYS FOR DEFENDANTS NETVERTISE LTD., D/B/A HARDXXXTUBE.COM, RICHARD SZELES AND LASLO RACZ

COPY TO:

Chad Belville Chad Belville Attorney at Law P.O. Box 17879 Phoenix, AZ 85066

CERTIFICATE OF SERVICE
The undersigned hereby certifies that a copy of this document was served upon counsel of record for each party to the action in compliance with FRCP 5 on May 10, 2012, by:
[ x ] Electronically via ECF for ECF registrants [ ] U.S. Mail [ ] Fax [ ] Fed Ex [ ] Hand Delivered [ ] other
By: Heather Bertch